

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION**

Kevin Turner and Shawn Wooden, *on behalf of
themselves and others similarly situated,*

Plaintiffs,

v.

National Football League and NFL Properties,
LLC, successor-in-interest to NFL Properties,
Inc.,

Defendants.

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF WILLIAM T. GIBBS, PURSUANT
TO THIS COURT'S ORDER DATED MARCH 28, 2018 (ECF: 9833)**

I, **WILLIAM T. GIBBS**, declare the following, pursuant to 28 U.S.C. § 1746:

1. I am an attorney licensed to practice law in the State of Illinois, and a partner in the law firm of Corboy & Demetrio, P.C.

2. All matters stated herein are personally known to me, and if called as a witness in this matter, I could competently testify thereto.

3. Corboy & Demetrio, P.C. is listed as one of the firms entitled to payment from the Attorneys' Fees Qualified Settlement Fund and hereby answers the following questions presented by the Court:

1. How many Settlement Class Members have you, your law firm or any attorney associated with you law firm:

DECLARATION OF WILLIAM T. GIBBS

A. Previously represented in this litigation and do not currently represent?

Answer: Corboy & Demetrio previously represented and does not currently represent four (4) Settlement Class Members.

B. Currently represent in this litigation?

Answer: Corboy & Demetrio currently represents fifty-six (56) Settlement Class Members.

2. How many Settlement Class Members previously or currently represented by you, your law firm or any attorney associated with your law firm:

A. Have received a Monetary Award?

Answer: Two (2) Representative Claimants have received payment.

B. Have been informed that they are entitled to receive a Monetary Award?

Answer: Corboy & Demetrio has not been informed of any other Settlement Class Members' Monetary Awards being approved.

C. Have applied for a Monetary Award?

Answer: Corboy & Demetrio has filed seven (7) Settlement Class Members' claims for a Monetary Award.

D. That you have knowledge that they will be eligible to receive a Monetary Award?

Answer: Based on my information and belief, it is likely that an additional twelve (12) Settlement Class Members will be eligible to receive a Monetary Award within the next calendar year. It is premature to speculate if/when others may be eligible.

3. How many Settlement Class Members previously or currently represented by you, your law firm or any attorney associated with your law firm have entered agreements to assign their rights to a Monetary Award ("Assignment(s)")?

Answer: None of the Settlement Class Members that Corboy & Demetrio represents have entered agreements to assign their rights to a Monetary Award.

DECLARATION OF WILLIAM T. GIBBS

4. Of the total number of Settlement Class Members included in your answer(s) to question two, how many of these Settlement Class Members have also entered into the Assignments referenced in question three?

Answer: None of the Settlement Class Members that Corboy & Demetrio represents have entered into Assignments referenced in question three.

5. Are you, your law firm or any attorney associated with your law firm obligated to pay or forward (directly or indirectly) any portion of a Settlement Class Member's Monetary Award to any third-party litigation funder?

Answer: Corboy & Demetrio is not obligated to pay or forward any portion of a Settlement Class Member's Monetary Award to any third-party litigation funder.

6. Explain any other role that you, your law firm, or any attorney associated with your law firm may have had in creating, promoting, or facilitating the Assignments referenced in question three and/or the obligations referenced in question five.

Answer: Not applicable.

7. Do you, your law firm, any attorney associated with your law firm or any individual or entity related to your law firm have any direct or indirect (professional or personal) association with any of the third-party litigation funders used by Settlement Class Members previously or currently represented by you, your law firm or any attorney associated with your law firm? If so, provide details of that association. If any of these individuals and/or entities had such an association in the past, provide details of that association. If any of these individuals and/or entities anticipates having such an association in the future, provide details of that association.

Answer: Not applicable.

DECLARATION OF WILLIAM T. GIBBS

8. Have any of the Assignments referenced in question three been resolved in accordance with the rescission process provided for in ECF No. 9517? If so, indicate those that have been resolved by their designated letter (See “Documents,” below) and the date of the resolution.

Answer: Not applicable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2018, at Chicago, Illinois.

/s/ William T. Gibbs

Thomas A. Demetrio

William T. Gibbs

Corboy & Demetrio, P.C.

Attorneys for Plaintiff

33 North Dearborn Street, 21st Floor

Chicago, Illinois 60602

(312) 346-3191

ARDC Number: 6282949